

As I understand this rule, I will need to have all our Association members' and non-members' approval and signatures before I can fax them "any material advertising the commercial availability or quality of any property, goods, or services which is transmitted." This would include training classes, conventions, and anything else that funds are involved.

This creates a number of problems for my office specifically. First, I operate a field office for a national association. If a member contacts my office and requests information, I suspect I would need to first check with my home office to ensure that a written approval is on file before I could respond to that request. Additionally, I staff 6 different associations. I would therefore need to have different approvals on file for each company and verify each time I get a request for information whether that company has submitted a written authorization to my office.

This regulation would present an unimaginable amount of work and effort, all to contact those with whom we have an established relationship. Trade associations need to be exempted from this regulation.